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7  
8 IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS

9 ROBERT CHIN SUZUKI, ) CIVIL CASE NO. 08-0005

10 Plaintiff, )

11 vs. )

12 MING HUA Q. YOON, ) PLAINTIFF'S INITIAL  
13 ) DISCLOSURES

14 Defendant. )

15 \_\_\_\_\_ )  
16  
17 Plaintiff Robert Chin Suzuki, by counsel, submits the following disclosures pursuant to  
18 Federal Rule of Civil Procedure 26 (a) (1) and Local Rule 16.2CJ (d):  
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21 **Disclosures Pursuant to Rule 26(a)(1)(A)**  
**(Persons With Potentially Discoverable Information):**

22 The following individuals are likely to have discoverable information of Plaintiff's  
23 damages, including but not limited to, mental anguish, pain and suffering. They can be  
24 contacted through the Law Firm of O'Connor Berman Dotts & Banes:  
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27 • Robert Chin Suzuki (Plaintiff)  
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- Esther Suzuki (Plaintiff's wife)
- Robert Suzuki, Jr., 13 years old (Plaintiff's son)
- Anthony Suzuki, 11 years old (Plaintiff's son)
- Angeline Suzuki, 9 years old (Plaintiff's daughter)
- Goralyn Suzuki, 7 years old (Plaintiff's daughter)
- Bernie Sablan (Plaintiff's former boss/supervisor at NMC Book Store)
- Joe Santos (Plaintiff's brother-in-law)
- Jennifer Furey (Counselor, Community Guidance Center)

The following individuals are likely to have discoverable information of Plaintiff's medical condition and treatment:

- Dr. Larry Hocog, Commonwealth Health Center
- Emergency room attending physician – Commonwealth Health Center
- EMS personnel
- Dr. Ahmad Al-Alou – Pacific Medical Center
- Medical expert – unknown at this time

The following individual is likely to have discoverable information as to the October 24, 2007 incident.

• Sgt. Joseph Flores

Discovery into this matter is continuing. The individuals listed above may not constitute a complete listing of all names responsive to the disclosure requirement. Such information shall be forwarded to Defendant when it becomes available.

**Disclosures Pursuant to Rule 26(a)(1)(B) (Documents, Data and Tangible Things)**

- medical records of Plaintiff
- traffic crash report

As additional documents become available, they will be disclosed either by way of supplemental disclosures or discovery.

**Disclosures Pursuant to Rule 26(a)(1)(C) (Computation of Damages)**

Plaintiff claims damages for personal injury to include past and future medical expenses, past and future impairment of the ability to enjoy life, mental anguish, pain, physical suffering, statutory damages and, where appropriate, pre-judgment interest in an amount to be proven at trial but not less than \$100,000.00. Plaintiff claims attorney fees and costs in this litigation.

**Disclosures Pursuant to Rule 26(a)(1)(D) (Insurance Agreement)**

Plaintiff does not know of any such applicable document but assumes one must exist.

Plaintiff will supplement these disclosures if and when further information becomes available.

Dated: April 4, 2008.

O'CONNOR BERMAN DOTT & BANES  
Attorneys for Plaintiff Robert Chin Suzuki

By: DAVID G. BANES